

December 8, 2004

Cornelia Mueller  
Environmental Protection Division, Code 408  
NETC PWD Bldg. 1  
1 Simon Pietri Drive  
Newport, RI 02841

RE: Former Navy Exchange Gas Station (Building 62CC), Dorektor Shipyard, Naval  
Education and Training Center, Newport, Rhode Island

Dear Ms. Mueller,

The Office of Waste Management has received the Soil Management Plan and Monitoring Wells for Former Building 62 Consolidated Headquarters Project, dated December 6, 2004. As of this writing this Office has not received a remedial investigation work plan for the site. There are concerns that the highest concentration of TPH, 17,500 ppb, was observed at a location side gradient of the site in what appears to be the proposed foot print for the Consolidated Headquarters Building. The Navy needs to determine whether the concentrations observed at this location reflects an unknown up gradient source, migration via underground conduits, whether higher concentrations are present in the area, etc. Other issues associated with the site, such as the potential for sumps, presence of chlorinated solvents, etc. at the former Building 62 location appear to be outside of the Consolidated Headquarters building footprint.

The Office of Waste Management is aware that since the Navy is in the early stages of constructing a building on the site it is in the best interest of the Navy to perform the remedial investigation now as it will have limited impact on the building construction schedule, facilitate any necessary actions at the site, avoid performing an investigation at a completed building, reduce overall cost and provide useful information as to whether volatilization is a concern for the inhabitants of the proposed building. To this end the Office of Waste Management is willing to work with the Navy to expedite the investigation of this portion of the site. Possible avenues to investigate the site may entail the installation of micro wells, or test pits, etc.

Please contact this office at 401-277-3872 if the Navy has questions concerning this matter.

Sincerely,

Paul Kulpa, Project Manager  
Office of Waste Management  
cc: Richard Gottlieb, OWM  
Kimberlee Keckler, USEPA

**Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF**

---

**From:** Helland, Brian J CIV ENGFLDACT NORTHEAST  
**Sent:** Wednesday, December 08, 2004 10:34 AM  
**To:** Mueller, Cornelia A CIV N8N, Env Off  
**Cc:** Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF  
**Subject:** RE: NEX Building Derecktor Shipyard

I think our position should be that no further action is required. He cites TPH in groundwater as a reason to investigate, but there are no GB standards for TPH. The levels of other constituents for which there ARE standards were all OK. Note that the TPH concentration was in ppb, so it isn't nearly as bad as he makes it look.

There is no money budgeted for an investigation of this site, and I doubt it would rank very high on the priority list. His concern over vapor intrusion is a bunch of baloney.

-----Original Message-----

**From:** Mueller, Cornelia A CIV N8N, Env Off  
**Sent:** Wednesday, December 08, 2004 10:12  
**To:** Helland, Brian J CIV ENGFLDACT NORTHEAST; Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF; Sylvester, Arthur D CIV N8N, Env Off; Mills, James I CIV ENGFLDACT NORTHEAST  
**Subject:** FW: NEX Building Derecktor Shipyard

-----Original Message-----

**From:** Paul Kulpa [mailto:paul.kulpa@dem.ri.gov]  
**Sent:** Wednesday, December 08, 2004 9:36  
**To:** Paul Kulpa; Kymberlee Keckler (E-mail); Mueller, Cornelia A CIV N8N, Env Off  
**Subject:** NEX Building Derecktor Shipyard

<<EMAIL.DOC>>